UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

YAAKOV Y. GROSS,	Case No.: 1:21-cv-01329
Plaintiff,	
v.	
<u>R</u>	RULE 26f MEETING REPORT
TRANSUNION, LLC	
Defendants,	

Plaintiff Yaakov Gross and Defendant TransUnion LLC, by and through counsel, hereby submit their Joint Rule 26f Meeting Report.

Have the parties met and conferred? Yes

Date the Rule 26(a)(1) initial disclosures were exchanged? Plaintiff: 4/20/21; Trans Union: 4/23/21

Proposed Discovery Plan

- 1. Deadline for parties to provide properly executed medical authorizations/releases: Plaintiff has not sought any professional medical treatment in relation to his claims against TransUnion and as such will not agree to produce executed medical authorizations/releases.
- 2. Deadline to join new parties or amend the pleadings: June 21, 2021
- 3. Should any changes be made in the limitations on discovery imposed under the Federal Rules of Civil Procedure or by local rule? NO.
- 4. Deadline to file any protective order: August 23, 2021
- 5. The parties shall complete all fact discovery by: September 20, 2021
- 6. The parties shall complete expert discovery, if necessary, by:

Expert Disclosures: October 25, 2021 Rebuttal Disclosures: November 29, 2021 Close of Expert Discovery: December 27, 2021

7. The parties shall file any pre-motion conference request by: December 27, 2021

- 8. Should the Court hold an early settlement conference in this action? NO
- 9. Have the parties agreed to a plan regarding electronic discovery? YES, the parties will exchange electronic discovery via email in pdf format.
- 10. Do the parties consent to trial before a magistrate judge pursuant to 28 U.S.C. §636? NO.

Dated this 23rd day of April, 2021.

Respectfully Submitted,

/s/ Daniel Zemel
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CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of April, 2021, a true and correct copy of the foregoing document was sent to all counsel of record in the present action via the Court's ECF filing system.

/s/ Daniel Zemel
Daniel Zemel, Esq.